

ORIGINAL

**BELLSOUTH**

Kathleen B. Levitz  
Vice President-Federal Regulatory

July 26, 1999

RECEIVED  
JUL 27 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351  
202 463-4113  
Fax: 202 463-4198  
Internet: levitz.kathleen@bsc.bls.com

WRITTEN EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W., Room TWB-204  
Washington, D.C. 20554

EX PARTE OR LATE FILED

Re: CC Docket No. 96-98

Dear Ms. Salas:

This is to give notice that on July 26, 1999, I sent by facsimile the attached written ex parte to staff in the Common Carrier Bureau.

In accordance with Section 1.1206(b)(1), I am filing two copies of this notice in the docket identified above. If you have any questions concerning this, please call me.

Sincerely,



Kathleen B. Levitz  
Vice President – Federal Regulatory

Attachment

cc: Jake Jennings  
Claudia Fox  
Anthony Mastando  
Sanford Williams

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**Kathleen B. Levitz**  
Vice President-Federal Regulatory

Suite 900  
1133-21st Street, N.W.  
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July 26, 1999

WRITTEN EX PARTE

Mr. Jake Jennings  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
Room 5-C260  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket No. 96-98

Dear Mr. Jennings:

On July 22, 1999, representatives of BellSouth held a conference call with you and other FCC staff to discuss issues relating to the Commission's UNE Remand proceeding. In particular, we discussed signaling issues arising when CLECs seek to provide their own operator services platforms. BellSouth described the efforts we have undertaken and have offered to undertake to provide CLECs with the sort of signaling they need when offering such services. We described a solution that BellSouth had developed for MCI in Southern Florida, a solution we are prepared to pursue with any interested CLEC throughout our region. During this discussion FCC staff asked that we provide a written description of that solution, and the extent of its availability, as well as documentation of the time required to provide selective routing capability to AT&T.

During the meeting we also described the different modes through which a CLEC can gain access to directory listing information and the charges for such access. FCC staff asked that we provide the number of customers, by category, for each of the BellSouth's directory listings and database services. Finally we discussed the availability of alternative sources to meet CLECs' Signaling System 7 (SS7) needs. FCC staff asked that we submit in writing the number of facilities-based CLECs obtaining SS7 from BellSouth, as well as the number of CLECs operating in the BellSouth region, excluding pure resellers.

We hope that the FCC staff finds the attached information responsive to its requests. If after reviewing the attached information, any of you have any questions, please call me at 202.463.4113.

In accordance with Section 1.1206(b)(1), I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record of CC Docket No. 96-98.

Sincerely,

A handwritten signature in cursive script, reading "Kathleen B. Levitz".

Kathleen B. Levitz  
Vice President – Federal Regulatory

Attachment

cc: Claudia Fox  
Anthony Mastando  
Sanford Williams

Staff Request: Provide written confirmation of OS signaling alternatives available region wide to MCI and other CLECs. Include an explanation of how the alternatives work.

BellSouth Response:

Background:

In response to a Business Opportunity Request, Selective Routing was successfully completed for MCImetro in S. Florida using a DMS Access Tandem, with 1A, 5E, DMS 100, and EWSD subtending end offices. This was accomplished in translations by prefixing a pseudo code on the call sent from the end offices to the tandem, using SS7 traditional signaling. The pseudo code was used by the DMS access tandem to identify the proper MCI trunk group. The DMS tandem used Virtual Facility Groups, in a software loop-around arrangement, to convert the calls to Equal Access Signaling to be sent to MCImetro.

Again, at the request of MCImetro, similar testing was conducted in Georgia, using a 5ESS Access Tandem however, the 5ESS could not convert the signaling to Equal Access Signaling and the calls failed when they reached the MCImetro switch. At some point MCI was advised that we were confident that Equal Access Signaling could be sent via direct end office trunks however, MCImetro declined to pursue that option.

**FOLLOWING ARE THE POTENTIAL OPTIONS THAT COULD ACCOMPLISH ROUTING OPERATOR CALLS OVER FGD TRUNK GROUPS IN EQUAL ACCESS SIGNALING FORMAT. These are options that BellSouth would be willing to pursue with MCImetro or any other CLEC.**

- 1. For end offices homing off a DMS Access Tandem, the end office would prefix a pseudo code in front of the dialed digits to instruct the DMS office which trunk group to select. The DMS would then convert the signaling to Equal Access Signaling and route to the appropriate MCI FGD trunk group.**
- 2. For all other end offices, we could designate one or more DMS offices in the LATA as the Operator Services office for MCI, and the end office would prefix the pseudo code as described in 1.**
- 3. BST is developing an AIN solution to Selective Routing. At a high level this option requires that:**
  - a) A DMS office/s in the LATA be designated as an AIN HUB office. This office does not have to be an Access Tandem.**
  - b) A new trunk group be installed from the end office to the AIN HUB.**
  - c) New Line Class Codes be built in the end office to route operator, directory assistance and possibly repair traffic to the AIN HUB.**
  - d) AIN triggers be placed on the incoming trunks at the AIN HUB.**

- e) A database dip be made at the AIN HUB to determine the routing of the call.
- f) The CLEC has trunk groups installed at the AIN HUB office.

**This arrangement has been installed and made available to CLECs in the New Orleans LATA since September 1998. There is a project team in place now to expand this service and deploy it on a region wide basis. However, since this requires a new infrastructure, we feel that OPTIONS 1 & 2 are much more viable at this time.**

Staff Request: Provide the number of CLECs obtaining SS7 from BellSouth vs. the total number of CLECs operating in the BST region.

BellSouth Response:

Customers Accessing BST SS7 Directly = 12

Customers Accessing BST SS7 Through Third Party = 8

Total SS7 Customers = 20

Total CLECs in BST Region (excluding pure resellers) = 47

Staff Request: Provide the number of customers, by category, for BellSouth's DA listings/database services.

BellSouth Response:

***DIRECTORY ASSISTANCE DATABASE SERVICE (DADS):***

<b>CATEGORY</b>	<b>NUMBER OF CUSTOMERS</b>
<b>Database Service Providers</b>	<b>9</b>
<b>Inter-Exchange Carrier</b>	<b>1</b>
<b>Independent Telephone Company</b>	<b>1</b>

***DIRECT ACCESS TO DIRECTORY ASSISTANCE SERVICE (DADAS):***

<b>CATEGORY</b>	<b>NUMBER OF CUSTOMERS</b>
<b>Inter-Exchange Carrier</b>	<b>1</b>
<b>Independent Telephone Company</b>	<b>1</b>

Staff Request: Document the time it took to provide selective routing capability to AT&T.

BellSouth Response:

AT&T Selective Routing Dates - Georgia:

1. Selective Routing Request issued by AT&T June 5, 1997.
2. Test translations issued and test calls for selected line class codes were made in 3 test offices: East Marietta 1A, Dunwoody 5E, and Buckhead DMS 100 on July 1, 1997.
3. New FX lines were input in East Marietta, Dunwoody, and Buckhead. Joint testing was done with AT&T in these office from 8/4/97 – 8/15/97, using selected line class codes.
4. Complete set of Selective Routing translations was input in all Georgia offices between 7/4/97 and 9/14/97. MATV testing was also done on all translations.

AT&T Selective Routing Dates – S. Florida:

1. Selective Routing Request issued by AT&T August 21, 1997.
2. Test translations issued and test calls for selected line class codes were made in 4 test offices: Boca Main (EWSD), West Dade (DMS 100), Cyprus (5ESS), and Delray (1A) on October 28 and October 29, 1997.
3. New FX lines were input in Boca Main (EWSD), West Dade (DMS 100), Oakland (5ESS), and Delray (1A). Joint testing was done with AT&T in these office from 12/16/97 – 12/19/97, using selected line class codes.
4. Full deployment was not requested by AT&T, only testing.

AT&T Selective Routing Dates – Tennessee:

1. Selective Routing Request issued by AT&T August 21, 1997.
2. Test translations issued and test calls for selected line class codes were made in 6 test offices: Memphis Frazer (EWSD), Franklin (DMS 100), Nashville Madison (5ESS), Memphis Main (1A), Manchester (SC DC0), and Ashland (DMS 10) the week of December 1, 1997. (Note: it looks like we did some preliminary testing in October, 1997.)
3. New FX lines were input in Memphis Frazer (EWSD), Franklin (DMS 100), Nashville Madison (5ESS), Memphis Main (1A), Manchester (SC DC0), and Ashland



(DMS 10). Joint testing was done with AT&T in these office the week of December 8, 1997, using selected line class codes.

4. Full deployment was not requested by AT&T, only testing.